

1 Balam O. Letona, Esq. (Cal. Bar No. 229642)
2 Law Office of Balam O. Letona, Inc.
3 1509 Seabright Avenue, Suite C1
4 Santa Cruz, CA 95062
5 Telephone: (831) 421-0200
6 Facsimile: (831) 421-0400
7 balam@letonalaw.com

8 Luke Wallace
9 Robert David Humphreys
10 HUMPHREYS WALLACE HUMPHREYS, P.C.
11 9202 S. Toledo Avenue
12 Tulsa, OK 74137
13 luke@hwh-law.com
14 david@hwh-law.com
15 *Pro Hac Vice*

16 Attorney for Plaintiff:
17 Cynthia Todd

18 **IN THE UNITED STATES DISTRICT COURT**
19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

20 CYNTHIA TODD,

21 Plaintiff,

22 vs.

23 AT&T CORP., EQUIFAX INFORMATION
24 SERVICES LLC., NATIONAL CONSUMER
25 TELECOM and UTILITIES EXCHANGE, INC.,
26 EXPERIAN INFORMATION SOLUTIONS INC.,
27 and DOES 1-10.

28 Defendants.

Case No. 16-cv-03357-HSG

**STIPULATION AND ORDER
EXTENDING TIME FOR
EXPERT DESIGNATIONS**

29 The deadline to designate experts with reports expires on February 15, 2017. Though
30 Plaintiff propounded discovery and the Defendants have responded to that discovery the

parties are meeting and conferring with respect to the adequacy of those responses and the lack of production of certain documents. Additionally, Plaintiff still seeks the deposition of Defendants PMK witnesses and others. As such, Plaintiff is unable to meaningfully evaluate whether to retain an expert without the required discovery and any retained expert will need the outstanding discovery. As such, the parties agree and stipulate to change the last day to designate experts with reports from February 15, 2017 to March 17, 2017. All other dates to remain the same.

SO STIPULATED:

Dated: January 30, 2017

AT&T SERVICES, INC. - LEGAL
DEPARTMENT

By: /s/ Robert B. Mullen
Robert B. Mullen
Attorneys for Defendant
AT&T CORP.

Dated: January 29, 2017

JONES DAY

By: /s/ Andrew H. Dubin
Andrew H. Dubin
Attorney for Defendant Experian Information
Solutions, Inc.

Dated: January 29, 2017

KING & SPAULDING LLP

By: /s/ J. Anthony Love
J. Anthony Love
Attorney for Defendant Equifax Information
Solutions, Inc., and NCTUE

1 Dated: January 29, 2017

LAW OFFICE OF BALAM O. LETONA, INC.

2
3 By: /s/ Balam O. Letona

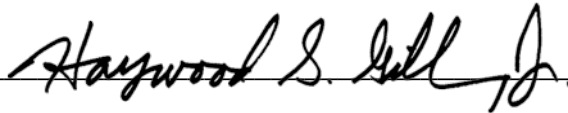
4 Balam O. Letona

5 Attorney for Plaintiff

CYNTHIA TODD

6
7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

8
9 DATED: January 31, 2017



10 United States District